## **Table Of Contents**

	Page No
. Ten Case Histories continued	
No. 8: Swiss American Bank and Swiss American National Bank	1
A. THE FACTS	1
(1) Ownership and Management	1
(2) Financial Information and Primary Activities	3
(3) Correspondents	4
(4) Operations and Anti-Money Laundering Controls	4
(5) Regulatory Oversight	5
(6) Money Laundering and Fraud Involving SAB/SANB	5
(a) Controversial Leadership	5
(b) The Fitzgerald Case Drugs and Terrorist Money	8
(c) The Gherman Fraud	13
(d) The DeBella Fraud	15
(e) The Fortuna Alliance Fraud	20
(f) Other Frauds/Questionable Accounts	23
(g) Internet Gambling/Sports Betting	24
(7) Correspondent Accounts at U.S. Banks	25
(a) Bank of New York	25
(b) Bank of America	36
(c) Chase Manhattan Bank	44
B. THE ISSUES	60
No. 9: M.A. Bank and No. 10: Federal Bank	63
A. THE FACTS	64
M.A. Bank	
(1) M.A. Bank Ownership and Management	64
(2) Financial Information and Primary Activities	65
(3) M.A. Bank's Correspondents	66
(4) M.A. Bank's Operations and Anti-Money Laundering Controls	66
(5) Regulatory Oversight	67
(6) Money Laundering and Fraud Involving M.A. Bank	68
(a) Laundering of Drug Proceeds through M.A. Bank	68
(b) Unsound and Illegal Banking Practices	72
(7) Correspondent Account at Citibank	77

Federal	Bank	89
(1) Grupe	o Moneta and Banco Republica	89
(2) Feder	ral Bank Ownership	90
(3) Finan	cial Information and Primary Activities	91
(4) CEI		93
(5) Corre	spondent Account at Citibank	94
(6) Regu	latory Oversight	96
(7) Centr	al Bank of Argentina Concerns	97
(8) Amer	rican Exchange Company	104
(9) Suspi	cious Activity At Federal Bank	105
B. THE ISS	UES	110
EXHIBITS		113